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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

LHF PRODUCTIONS, INC., Plaintiff, vs. DOES 1- 27, Defendants.	Civil Action No. 2:16-CV-01262-DBP Magistrate Judge Dustin B. Pead **EX PARTE MOTION FOR EXTENSION OF TIME FOR SERVICE PURSUANT TO FRCP 4(m).**

Pursuant to Federal Rule of Civil Procedure 4(m), Plaintiff LHF Productions, Inc. moves the court for an extension of time for service of the defendants, Does 1-27.

A. Statement of Basis for Relief and Relief Requested.

After receiving information from the Internet Service Providers (ISP) identifying defendants, LHF has worked with each defendant in a diligent effort to resolve this case without formal proceeding. Despite this, some defendants have not yet responded to LHF's settlement efforts. LHF is seeking settlement with all identified defendants.

LHF seeks a ninety day extension of time for service.

B. Facts and Argument Establishing Good Cause to Extend Time for Service

This action was filed on December 15, 2016 and the matter was referred to Judge Pead on December 19, 2016. On January 3, 2017, LHF requested to expedite discovery of the internet services providers. This motion was denied January 4, 2017 without prejudice due to the exclusion of an important exhibit mentioned in Daniel Arheidt's expert declaration. The next day, the motion for expedited discovery was repeated with the necessary corrections and granted on January 5, 2017. That same day, counsel diligently issued a subpoena to the respective Internet Service Providers seeking the identifying subscriber information for the designated Doe defendants 1-27.

Due to internal policies of the Internet Service Providers allowing the subscribers to object to the release of their identifying information, and other delays in responding to the subpoenas, the Internet Services Provider, Comcast, was unable to respond to the subpoena until February 13, 2017. CenturyLink, the other ISP in the case, did not respond until February 8, 2017.

After receiving communications from corresponding ISPs with information identifying Does 1-27, LHF has written letters to, exchanged emails with and/or spoken via telephone with defendants seeking to resolve this case without formal proceedings. LHF is currently working with a number of defendants to resolve the matter or otherwise assist LHF in resolving the matter.

LHF continues to attempt to resolve the matter quickly as to all defendants. Due to delays in obtaining identifying information of the defendants and because LHF is attempting to resolve the matter as to all identified defendants so this action may be closed, good cause exists for extending the time for service.

LHF requests a ninety (90) day extension of time in which to serve the Doe Defendants 1-27. No previous request for extension of time has been requested. LHF respectfully requests that this motion be granted.

DATED this 18th day of April, 2017.

KIRTON McCONKIE

By: /s/Todd E. Zenger
Todd E. Zenger

Attorneys for Plaintiff
LHF PRODUCTIONS, INC.